IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

POP TOP CORP.,				
Plaintiff,				
v.	Civil Action No. 6:21-cv-00315-ADA			
AMAZON.COM, INC.,	JURY TRIAL DEMANDED			
Defendant.				

UNOPPOSED MOTION FOR ENTRY OF CONFIDENTIALITY AND PROTECTIVE ORDER

Amazon.com, Inc. hereby submits an unopposed motion entry of the attached Protective Order. The Protective Order is necessary to preserve and maintain the confidentiality of personal, private, confidential, and/or commercially sensitive information regarding the parties, employees, former employees of the parties, and third parties that might be disclosed during the course of discovery in this litigation. WHEREFORE, the parties respectfully request that the Court grant the Unopposed Motion for Entry of Protective Order and enter the attached Protective Order.

Dated: October 22, 2021 Respectfully submitted,

/s/ Daniel T. Shvodian

M. Craig Tyler, Bar No. 794762 PERKINS COIE LLP 500 W 2nd St, Suite 1900 Austin, TX 78701-4687

Telephone: (737) 256-6113 Facsimile: (737)256-6300

Daniel T. Shvodian, *Admitted Pro Hac Vice* PERKINS COIE LLP 3150 Porter Drive Palo Alto, CA 94304-1212 Telephone: (650) 838-4300 Facsimile: (650) 838-4350

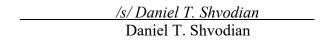
Kevin A. Zeck, *Admitted Pro Hac Vice* PERKINS COIE LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Telephone: (206) 359-8000 Facsimile: (206) 359-9000

W. Matthew Pierce, *Admitted Pro Hac Vice* PERKINS COIE LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Telephone: (206) 359-8000 Facsimile: (206) 359-9000

Attorneys for Defendant Amazon.com, Inc.

CERTIFICATE OF CONFERENCE

	I have c	onferred v	with counse	l for Pop	Top Corp.	, and Pla	intiff do	es not o	oppose	this mo-
tion 1	for entry o	f confiden	tiality and p	protective	e order.					



CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on October 22, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

